

My name is Jim Grant, and I am the General Manager and Associate Minister of the Victory Television Network in Little Rock, Jonesboro, and Hot Springs Arkansas.

I write in opposition to any proposal for federally mandated "a la carte" regulation. In particular, I write in response to the Parents Television Council comment supporting a la carte, and the Faith and Family Broadcasting Coalition comment opposing a la carte.

I would like to draw the Commission's attention to the unintended consequences of following even well intentioned Americans into a policy that would replace the judgment of parents, communities, and media markets with that of Federal mandates.

It is clear that the Parents Television Council is fed up with the programming it sees on television that is indecent, and totally inappropriate for children. As parents, they are properly concerned and should be commended for speaking out. However, as a religious broadcaster, I must side with the Faith and Family Broadcasting Coalition's opposition to a la carte, since the blunt instrument of a la carte would throw religious broadcasting off the airwaves right along with the programming to which the Parents Television Council so vigorously objects.

Again, I do not question or fault the motives of the Parents Television Council. I am simply compelled to point out that religious broadcasters might well be banished from the airwaves if a la carte is instituted because it will fail the economic and ratings tests where rival commercial programming has the clear advantage.

I do not believe for a moment that the Parents Television council or other proponents of a la carte wish to injure religious broadcasters. I simply believe the very real and very serious injury that would be done to religious broadcasters would be the unintended consequences of the a la carte policy they are now promoting.

I would like to support the Faith and Family Broadcasting Coalition's opposition to a la carte. These colleagues and pioneers of religious broadcasting have labored long and hard to bring this medium to a level where Americans almost anywhere can tune into a religious broadcast in good times and bad.

What we religious broadcasters do is important. It is hard work, and it costs money. All the labor and creative business practices that have gone in to what we are now must be maintained and increased. All of this is threatened by a la carte.

Think for a moment about just how valuable a religious broadcast is to those who tune in at a time of personal reckoning, or a family crisis, or a period of infirmity where traveling to church is not an option. But to a "mere consumer" not in any of those conditions or times of need, religious broadcasting may seem superfluous, and might well be too expensive for many if the a la carte regulations are established.

As I said, I respect the good intentions of the parties exercising their rights as citizens to comment on these proposed regulations. I only ask that they, and you, the commissioners of the Federal Communications Commission, respect the position of religious broadcasters who are providing a valuable civic and spiritual service to our countrymen. Please help us be there when they need us. Please oppose a la carte.

Respectfully submitted:

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Little Rock, Jonesboro, Hot Springs  
The Victory Television Network